90-190

No. _____

In The
Supreme Court Of The United States

OCTOBER TERM, 1989

**IN THE MATTER OF MICHAEL J. DODSON,
AN ATTORNEY-AT-LAW OF THE
STATE OF CONNECTICUT,**
Petitioner,

v.

**SUPERIOR COURT OF THE
STATE OF CONNECTICUT,**
Respondent.

PETITION FOR WRIT OF CERTIORARI
TO THE SUPREME COURT OF THE
STATE OF CONNECTICUT

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Whether the summary criminal contempt conviction of a criminal defense attorney for brief and spontaneous remarks made immediately subsequent to the imposition of a substantial sentence, violates his First Amendment rights of expression and the Sixth Amendment rights of his client to vigorous representation of counsel.

2. Whether petitioner was afforded a fair hearing for the charges of criminal contempt where he was adjudicated without benefit of notice of the charges, an evidentiary hearing or of representation of counsel.

LIST OF PARTIES

The caption of the case contains all parties.

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TABLE OF AUTHORITIES

Statutes:

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OPINIONS BELOW

The decision of the Supreme Court of Connecticut is reported at 214 Conn. 344, ____ A.2d ____ (1990), and is reprinted in the Appendix (2a-82a). The decision of the Connecticut Superior Court, Appellate Decision, is unreported.

JURISDICTION

The judgement and opinion of the Supreme Court of Connecticut, affirming the judgment of the trial court summarily convicting defendant of contempt, was entered on April 25, 1990. This Court has jurisdiction to review the judgement of the Supreme Court of Connecticut pursuant to 28 U.S.C. Section 1257(3).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED IN THIS CASE

FIRST AMENDMENT
UNITED STATES CONSTITUTION

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people

peaceably to assemble, and to petition the Government for a redress of grievances.

SIXTH AMENDMENT
UNITED STATES CONSTITUTION

Jury trial for crimes and procedural rights

In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed by the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the Assistance of Counsel for his defense.

FOURTEENTH AMENDMENT SEC. ONE
UNITED STATES CONSTITUTION

Sec. 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any laws which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

CONNECTICUT PRACTICE BOOK
SECTION 988

CRIMINAL CONTEMPT--SUMMARY CONTEMPT
NATURE OF PROCEEDINGS

A criminal contempt may be punished summarily if the conduct constituting the contempt was committed in the actual presence of the court or the judicial authority and such punishment is necessary to maintain order in the courtroom. A judgment of guilty of contempt shall include a recital of those facts on which the adjudication of guilt is based. Prior to the adjudication of guilt the judicial authority shall inform the defendant of the accusation against him and inquire as to whether he has any cause to show why he should not be abjudged guilty of contempt by presenting evidence of excusing or mitigating circumstances. (P.B. 1962, Sec. 2399).

18 U.S.C. Section 401 (1970)

A court of the United States shall have power to punish by fine or imprisonment, at its discretion, such contempt of its authority, and none other, as --

(1) Misbehavior of any person in its presence or so near thereto as to obstruct the administration of justice;

(2) Misbehavior of any of its officers in their official transaction;

(3) Disobedience or resistance to its lawful writ, process, order, rule, decree, or command.

STATEMENT OF THE CASE

A. Procedural History

On November 10, 1988, Petitioner, Michael J. Dodson, Esquire was convicted of Contempt by a judge of the Superior Court of Connecticut. On November 15, 1988, a fine of $100 was imposed. On November 28, 1988, the petitioner filed a Motion for Articulation of the sanction's nature. On December 9, 1988, the court issued its articulation.

On March 27, 1989 the Supreme Court of the State of Connecticut affirmed the conviction. See Opinion at 2a to 82a.

B. STATEMENT OF FACTS

On November 10, 1988, the petitioner, an attorney licensed to practice law in the State of Connecticut was representing a client in State v. Walker, at a sentencing hearing held before the honorable James Higgins, presiding over

the Superior Court. The petitioner's client had recently been convicted by jury, of murder. During the hearing and immediately subsequent to the imposition of sentence the following dialogue transpired between the Court and the petitioner:

"Mr. Dodson: I think it is most unusual. I think that is totally outrageous. The court can do-

"The Court: You may notify the defendant-

"Mr. Dodson: Thirty years more on the same set of facts, I think ...

"The Court: Notify the defendant of his rights to appeal.

"Mr. Dodson: There is no basis-

"The Court: You're out of order.

"Mr. Dodson: I know I am, but there is no basis for that sentence.

"The Court: He is held in contempt of this Court.

"Mr. Dodson: I apologize for my remarks.

"The Court: Notify the defendant of his rights to appeal on the record."

1T1[1]

At the conclusion of the proceedings, the petitioner was directed to remain within the confines of the courtroom and afforded the opportunity to obtain counsel, albeit within the limits of his confinement.

On November 15, 1988, the petitioner, having been released on his own recognizance and his counsel appeared before the court, Judge Higgins presiding. At this time both individuals were allowed to address the court. Without articulating the factual finding of contempt or setting forth a factual basis for its decision, the court imposed a fine of $100. (2T7).

On November 28, 1988, the petitioner

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[1]"1T" refers to the transcript dated November 10, 1988; "2T" refers to the transcript, dated November 15, 1988.

filed motions for an extension to file a Writ of Error to the Connecticut Supreme Court or in the alternative, for an Appeal to the Appellate Court. The reasons set forth in the requests were based upon the absence of a specific rendition of summary criminal contempt. A request for such clarification was made by counsel at the November 15th hearing. The request was not acted upon by the court at that time. In addition to the above-mentioned pleading, the petitioner submitted to the court a written Motion for Articulation. The motion was granted and an articulation of summary criminal contempt pursuant to Connecticut Practice Book Section 988 was issued on December 9, 1988.

THE OPINION OF THE

CONNECTICUT SUPREME COURT

The Connecticut Supreme Court, sitting

en banc, affirmed the petitioner's conviction with on justice dissenting. The court initially recognized that an attorney should be zealous in his representation of a client and that this right must be fully enjoyed with due allowance for the heat of controversy. The majority also recognized that the role of a judge requires caution and circumspection in the use of his or her power to prevent disruptions and distractions. App. 161 - 19a.

Directing its attention to the petitioner's "outburst," during the sentencing, the court noted that at the moment, the judge was attempting to instruct the clerk to inform the Defendant of his rights to appeal the verdict and was twice interrupted by the petitioner who failed to take heed of the court's "warning" that he was "out of

order." The opinion below also noted that in the course of the colloquy, the petitioner's voice Was "elevated" and that he "threw" his pencil on the counsel table. App. 29a - 33a.

The petitioner's conduct was found to be consistent with behavior which immediately imperiled the dignity and authority of the court. The interruption of the clerk's task to notify the Defendant of his rights was held to constitute an obstruction of a valid court order, directly hindering the orderly processing of judicial business. App. at 33a - 36a.

Finally, the court found that the immediate adjudication of contempt without affording the petitioner an opportunity of notice or hearing did not violate his due process protection. The court reasoned that the judge's

admonition that the petitioner was "out of order" provided a clear and definite caution. Further, the fact that the petitioner was allowed a continuance to obtain counsel and to address the court prior to sentencing satisfied the due process requirements. App. at 44a - 47a.

In his dissent, Justice Shea noted that the elemental due process protection are contained within the mandatory requirements of Section 988 of the Connecticut Practice Book. He further observed that the trial court's failure to inform the petitioner of the accusation against him and inquire as to whether he ad evidence to excuse or mitigate prior to the actual adjudication, as is required by the Practice Book, was a violation of substantial proportions.

REASONS FOR GRANTING PETITION

I. THIS MATTER RAISES THE ISSUE OF THE SUBSTANTIVE SCOPE OF JUDICIAL CONTEMPT POWER AND ITS RELATIONSHIP TO THE CONSTITUTIONAL RIGHTS ASSOCIATED WITH THE PROTECTION OF ADVOCACY.

The most recent decision of this court concerning the constitutional limitations of summary contempt power have restricted its exercise to those situations involving imminent threats of obstruction or actual obstruction of judicial proceedings. In Re Little, 404 U.S. 553 (1972); In Re McConnell, 370 U.S. 230, 233-34 (1964).

Despite these holdings, there exists a wide disparity of definitions employed by the highest state Appellate courts and Federal Circuits.[2] In addition, numerous

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[2]See e.g. Weiss v. Burr, 484 F.2d 973, 982 (9th Cir. 1973) (state prosecutor's conduct measured by '[significant, imminent threats to fair administration of justice"); Hawk v. Cardoza, 575 F.2d 732, 735 (9th Cir. 1978) (Actual obstructing standard applied to conduct in state proceeding);

state statutes employ definitions of contempt which are broader than actual obstruction or imminent threat or have not provided any definition of the offense, effectively leaving this task to the court discretion.[3]

The lack of uniformity of the scope of contempt power has arguably created a standard of total judicial discretion,

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State v. Harper, 297 S.C. 275, 375 S.E.2d 272, 274 (1989) (actual obstruction); Ex parte Krupps, 712 S.E.2d 144, 150 (Tex.Ct.App. 1986), cert. denied, 479 U.S. 1102 (1987) ("criminal contempt is not restricted to conduct that obstructs or tends to obstruct the proper administration of justice."); In Re James B. Daniels, 118 N.J. 51, 570 A.2d 416 (1990), cert. pending (contempt is conduct which has "the capacity to obstruct the administration of justice.").

[3] See e.g., Colo. Rev. Stat. 10-1-104 (1978 Repl. Vol. 8); Fla. Stat. Ann. 900.04 (West 1984); Ill. Rev. Stat. Ch. 38, Sections 1 - 3 (1989); R.I. Gen. Laws Ann. Sections 8-6-1 (1985); Tex. Govt. Code Ann. Section 21.002 (Vernon 1988); Vt. Stat. Ann. Tit. 12, Sections 121-23.

unrestricted by objective criteria and grounded in the subjective sensibilities of the trial courts.

Similarly, even when an actual obstruction standard is employed, as it was in the instant matter, the definition of obstructive behavior remains vague and ambiguous. This result is problematic as it renders the scope of contempt equally susceptible to the subjective will of the courts.

The differences in both definition and application of the contempt power militates in favor of guidance by this court. In the absence of such guidance, the potential for arbitrary and subjective use of contempt threatens to create a chilling effect upon zealous advocacy undertaken in good faith and protected by the First and Sixth Amendments.

A. THE DEFINITION OF CONTEMPT AS ARTICULATED BY THE CONNECTICUT SUPREME COURT IS UNCONSTITUTIONALLY OVERBROAD

In its opinion, the Connecticut Supreme Court dealt with an incident described as being an "outburst," consisting of approximately four sentences uttered by the petitioner. App. at 8a - 9a; 31a - 35a. Commencing with the observation that "[f]rom necessity the court must be its own judge of contempt committed within its presence," the court proceeded to characterize the petitioner's outburst as a significant hindrance to the authority of the court's authority. App. at 38a - 43a. [emphasis added].

The decision specifically held that the petitioner's conduct directly interfered with the court's order to the clerk to notify the Defendant of his rights to appeal. This, according to the decision, amounted to obstruction of the execution

of a valid court order as it "directly hindered and interfered with the Superior Court qua Superior Court in its orderly processing of the business before it." App. at 43a - 47a

Throughout the aforementioned discussion, no reference is made to any decision which supports the view that a momentary lapse of decorum, resulting in an equally brief interruption of court may be equivocated with the extraordinary remedy of summary criminal contempt.

The petitioner submits that this decision has failed to comport with the stringent restrictions imposed by this court to protect the zealous representation of counsel. Rather, in premising its holding upon the necessity of allowing the trial court broad powers of judgment as to what constitutes contempt, and in failing to delineate

merely excessive advocacy from actual obstruction, the Connecticut Supreme Court has neglected to enforce the mandates set forth by this Court.

In Bridges v. California, 314 U.S. 252 (1941), this court reversed on first amendment grounds, contempt convictions for extrajudicial statements critical of judges conduct. In Eaton v. City of Tulsa, 415 U.S. 697, 698 (1974) (per curiam), this court held that the first amendment prevents contempt convictions where verbal behavior does not constitute an "imminent threat to the administration of justice."

In Sacher v. United States, 343 U.S. 1, 8-9 (1952), this court held that summary punishment is rightfully to be regarded with disfavor. In cases involving summary criminal contempt, the use of the remedy must be tempered by due allowance

for the heat of controversy. Further, this court has stated that such an allowance "will be protected by the appellate Courts when infringed by trial courts."

This court has recognized that the allegedly contumacious expression or conduct of an attorney must be evaluated within the context of his role as advocate. In In Re McConnell, supra, the attorney failed to refrain from asserting his right to ask specific questions, even though he was ordered to do so by the judge. Id. at 232. The contemnor further stated, "we have a right to ask these questions....and we propose to do so unless some bailiff stops us." Id. at 235.

In reversing McConnell's conviction, this court found that nothing in the petitioner's conduct was "sufficiently

disruptive of the trial court's business to be a disruption of justice." Id at 235-236. [emphasis added].[4] Implicit in this court's decision, is the delineation between any disruption and conduct which is "sufficiently disruptive' as to be an obstruction of justice.[5]

This court has likewise considered the conviction of a pro se criminal defendant who was held in contempt for arguing in

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[4]The petitioner notes that while In Re McConnell was concerned with federal statutory contempt, this court extended its rationale to contemptuous conduct occurring in a state proceeding. In Re Little, supra.

[5]In United States v. Seale, 461 F.2d 345, 369 (7th Cir. 1972), the court likewise delineated mere interruption of judicial proceedings from material obstruction deserving of contempt. "Clearly....[the] proposed 'any interruption' standard is too encompassing, for trials are by nature adversary and contentious, and few proceed without some form of interruption." Id.

his summary that he was a political prisoner and was prejudiced by the trial judge's conduct. The lower court had characterized the contemnor's remarks as "very disrespectful and tended to subvert and prevent justice." In Re Little, 404 U.S. 554, 555 (1972) [emphasis added].

In reversing Little's conviction, this court rejected the lower Court's conclusion that the statements "directly tended to interrupt [trial] proceedings." Rather, this court held that the pro se litigant was "clearly entitled to as much latitude in the conduct of his defense as we have held is enjoyed by counsel vigorously espousing a client's cause." Id. [citation omitted].

The Little decision closely tracked McConnell in delineating the standard of "any interference" from that of an imminent threat to the administration of

justice.[6] Implicit in both decisions is the awareness of the court that the vigorous espousing of advocacy cannot always be reconciled with "automaton-like reflexive obedience to court orders." United States v. Seale, supra at 373.

The instant matter is constitutionally problematic because no attempt is made by the Connecticut court to explain how "the authority of the [trial] court in this case was significantly hindered by the

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[6] See Raveson, Advocacy and Contempt: Constitutional Limitations on the Judicial Contempt Power, 65 Wash.L.Rev.____ (July, 1990), presenting the proposition that the actual obstruction and imminent threat standards reflect identical constitutional concerns and should product comparable results. This equivalence has also been accepted in cases arising from the federal contempt statute. See e.g., See, e.g., United States ex rel. Robson v. Oliver, 470 F.2d 10, 14 (7th Cir. 1972); United States v. Lumumba, 794 F.2d 806, 808 (2d Cir. 1986); Matter of Contempt of Greenberg, 849 F.2d 1251, 1255 (9th Cir. 1988; Gordon v. United States, 592 F.2d 1215, 1217 (1st Cir. 1979).

petitioner's conduct." App. at 43a - 47a. [emphasis added]. The opinion lacks a concise definite of what constitutes a "significant" interference of actual obstruction other than that the petitioner's brief "outburst" delayed the reading of the defendant's appellate rights.

The petitioner submits that in the absence of such a definition, the instant decision creates a dangerous precedent which equivocates an "actual obstruction of justice" with "any interruption" of court proceedings. Clearly such a result has the potential of engendering a chilling effect upon the bar's willingness to engage in advocacy which might, even inadvertently, create the most minimal interference with judicial process.

The ambiguous nature of the opinion

below allows for the implementation of an overly broad standard which fails to comport with the decisions of this court. As the application of Connecticut and other jurisdictions definitions of contempt threaten to undermine the role of effective and zealous advocacy, this court should reverse the instant ruling and resolve the disparity of opinion concerning the scope of the contempt power.

B. THE PETITIONER'S MOMENTARY REACTION IN RESPONSE TO THE TRIAL COURT'S SENTENCE FAILED, AS A MATTER OF LAW, TO CONSTITUTE CONTEMPT.

This Court's decisions have clearly stated that the power of contempt cannot be so broad in scope as to undermine the ability of counsel to zealously represent his client. See In Re McConnell, supra; In Re Little, supra. Similarly this Court has held that "[j]udges are

supposed to be men of fortitude, able to thrive in a hardy climate." Craig v. Harney, 331 U.S. 367, 376 (1947). Cf. Offut v. United States, 348 U.S. 11, 14 (1954) (noting that the judge's power of contempt is "totally unrelated to his personal sensibilities..."); In Re Little, supra (noting that the judges must be on guard against confusing offenses to their sensitivities with the obstruction of justice).

Both the McConnell and Little decisions involved conduct which clearly involved zealous behavior amounting to disrespect, discourtesy and some interference with the court's business, yet in neither case was contempt ruled to be appropriate. In McConnell, the contemnor actually challenged the dignity and integrity of the court by threatening disobedience of its order at least two separate times and

criticized its wisdom on three occasions. Id. at 235.

The undeniable result of the McConnell colloquy was the inter-ruption of the court's business, culminating the need for a recess as requested by co-counsel. The delay, although undeniable present, was not considered by this court as "sufficiently disruption of the trial court's business to be an obstruction of justice." Id. at 235-236.

The constitutionally mandated tolerance of the disrespectful and momentarily-delaying behavior of Attorney McConnell clearly demonstrates that this Court has never recognized the scope of contempt to encompass the natural consequences of vigorous advocacy such as occasional lapses of decorum, minor excesses in argument, cf In Re Little, supra or the insubstantial interruption or delay which

may result.

The fact that such lapses should not be given judicial imprimatur does not immediately make them susceptible to the extraordinary interdiction of contempt. See Dobbs, Contempt of Court. A Survey, 56 Cornell L.Rev. 183, 208 (1971) ("Where nothing more than disrespect or discourtesy is involved...the dangers of abuse of contempt power may outweigh the benefits of using that power."). The condoning of the use of contempt in situations involving momentary discourtesy or minor interruption cannot but cause all advocates to consciously avoid vigorous advocacy in an effort of self-protection. Such a retreat would threaten the very notions of sixth amendment protection.

In the opinion below, the court was concerned with an incident, the duration

of which was briefer than that of McConnell. Unlike McConnell the petitioner's statements included no threats to disobey the trial court's final order. Indeed, the spontaneity and brevity of the petitioner's "outburst," as described in the opinion below belies the lower court's characterization of its resulting in a substantial interference with the trial court's business. Significantly, absent from the opinion is citation to any federal or state case upholding a contempt conviction for conduct similarly spontaneous, brief and unobstructive.

The court below framed its opinion with the admonition that "[o]n the matter of 'courtroom decorum," an attorney '[a]s an officer of the court...should support the authority of the court and the dignity of the trial court by strict adherence to

the rules of decorum and by manifesting an attitude of professional respect toward the judge, opposing counsel, witnesses, jury and others in the courtroom." App. at 23a - 25a [citation omitted]. While acknowledgment and encouragement of "strict adherence" to decorum must be commended to all attorneys, the petitioner's brief and spontaneous reaction to the imposition of a substantial sentence cannot be held to justify the imposition of a criminal penalty if the freedom of the bar to engage in vigorous advocacy is to remain intact.

II. THE OPINION BELOW, UPHOLDING THE SUMMARY CRIMINAL CONTEMPT CONVICTION OF THE PETITIONER FOR CONDUCT INVOLVING A MINOR LAPSE OF DECORUM CONTRADICTS THIS COURT'S CASES AND IMPOSES AN UNCONSTITUTIONAL STANDARD.

The opinion below found substantial compliance with the Court Rules of

Practice which provide for the opportunity of notice and hearing prior to the adjudication of summary criminal contempt. App. at 363-364.

This Court has employed two justifications for the imposition of summary criminal contempt convictions. In United States v. Wilson, 421 U.S. 309, 316 (1975), this Court approved of immediate punishment where it was necessary to halt serious disruption of the court and to vindicate its authority. In cases such as Cooke v. United States, 267 U.S. 517, 534-536 (1925), the conduct occurred before the trial court and further fact-finding was found to be unnecessary.

The Petitioner submits that both prongs of these justifications must be present to allow the immediate imposition of the contempt conviction. However, this court

has not delineated the limits of the power to proceed in a summary manner and presents the instant case as providing the impetus for a more detailed guide from this Court, clarifying when normal due process protections may be dispensed with.

A. THE INSTANT MATTER DID NOT RISE TO A LEVEL WHERE IMMEDIATE PUNISHMENT WAS NECESSARY.

The extraordinary remedy of summary criminal contempt has been held to be appropriate where the conduct of the contemnor presents an ongoing threat to the proceedings of the court. See e.g., Wolfe v. Coleman, 681 F.2d 1302, 1306 (11th Cir. 1982). The measure has been rejected where conduct "cannot be said to have amounted to an obstruction of the orderly administration of the judicial process." Spruell v. Jarvis, 654 F.2d 1090 (5th Cir. 1981).

In the instant matter, the Petitioner's remarks cannot be characterized as so obstructive as to allow the normal protections of procedural due process to be jettisoned. The Petitioner submits that where the conduct does not immediately threaten the administration of justice, there is no compelling need for an immediate remedy, and the basic procedural protections must be enforced. See App. at 98a - 102a.

B. A HEARING HELD PRIOR TO ADJUDICATION WAS CONSTITUTIONALLY MANDATED TO RESOLVE ISSUES OF FACT AND LAW.

The instant matter occurred within a brief time frame, in the midst of an extremely critical stage of the proceedings. Particularly, when the aid of a transcript is employed, courts must be cognizant of the potential for over-simplification of the nature of the colloquies between judges and counsel.

Likewise and understandably, trial courts must be assumed to possess an immediate desire for resolution and indication of authority. Both factors militate in favor of an intensive review of constitutionally-sanctioned methodologies.

In the instant case, the petitioner's "outbursts" were spontaneous and indeed by their very brevity, pose serious issues regarding intent. The combination of the risk of judicial misperception of the events as well as the legal problem of the intentional nature of the Petitioner's conduct presents fundamental questions relating to the propriety of

summary action in this matter.[7]

The risk of error in a proceeding involving the imposition of criminal penalties militates in favor of the a factual hearing prior to the adjudication of contempt, and not merely an opportunity for allocation before sentence is passed as occurred in the instant matter.[8]

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[7]See Kuhns, The Summary Contempt Power: A Critique and a New Perspective, 88 Yale L.J. 39, 49-50 (1978): challenging a trial judge's ability to accurately find facts or determine mens rea of a contemnor in the absence of a hearing.

[8]As noted in the dissent below, "Anyone who is familiar with human nature must recognize the herculean task, imposed upon a litigant seeking reversal from the same trier of fact that has been publicly announced." App. at 100a.

CONCLUSION

The treatment of contempt has long been the subject of disparate and uneven treatment within our federal and state courts. Numerous lower decisions have yielded no uniformity and have created serious infringements of fundamental constitutional proportion. The more subtle, but no less injurious result is the potential engendering of a chilling effect upon the advocacy of all counsel who represent clients, be they governmental, corporate or personal, at trial. There is an immediate need for this court to further define both the substantive and procedural limits of contempt. For all the foregoing reasons, a Writ of Certiori should be granted for review of the issues raised herein.

Respectfully submitted,

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